

Expedited consideration of the Motion is necessary so that the orders entered or that will be entered in connection with the bankruptcy case of Probe Resources US Ltd., Case No. 10-40395, will also be applicable to the Debtor. In addition, the date which the Debtor seeks for hearing on the Motion has already been established as a hearing date by the Court with respect to the US Debtors, the relief requested in the Motion is not material, and most of the parties affected by the relief requested in the Motion were previously noticed of the matters referenced in the paragraph 4 of the Motion.

NOTICE

Notice of this Request has been given to: (a) the Office of the United States Trustee for the Southern District of Texas; (b) K-2 Principal Fund; (c) K2 Principal Fund, L.P.; (d) the initial Debtor; (e) Debtor's top twenty creditors as filed with the Petition; and (f) all parties who request notices pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure. In light of the nature of the relief requested, the Debtor submits that no further notice is required.

WHEREFORE, the Debtor respectfully requests that the Court enter an order granting the Debtor's Request for an Expedited Hearing of the Motion for Order Under Fed. R. Bankr. P. 1015(b), Directing Joint Administration and Other Relief.

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/s/Douglas S. Draper

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